

IN THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF VIRGINIA

Alexandria Division

UNITED STATES OF AMERICA

v.

No. 1:14-CR-306 - GBL

PEDRO ANTHONY ROMERO CRUZ,  
JOSE LOPEZ TORRES,  
JAIME ROSALES VILLEGAS,  
ALVIN GAITAN BENITEZ,  
CHRISTIAN LEMUS CERNA,  
OMAR DEJESUS CASTILLO,  
DOUGLAS DURAN CERRITOS,  
**MANUEL ERNESTO PAIZ GUEVARA,**  
JOSE DEL CID,  
JESUS ALEJANDRO CHAVEZ,  
Defendants

**MOTION FOR DESIGNATION OF RECORDED TELEPHONE CALLS**  
**THAT THE GOVERNMENT INTENDS TO SEEK TO USE AT TRIAL**

The accused, MANUEL PAIZ GUEVARA, by and through counsel, moves this Court to enter an Order requiring the government to identify the alleged date, time, parties to, and to provide transcripts (if in existence) of any recorded telephone calls that the government intends to introduce during either the guilt or penalty phases of the trial, and to do so at least 60 days prior to the commencement of trial.

This motion is made pursuant to Mr. Paiz Guevara's rights to due process of law, to, to a fair trial, to confront the evidence against him, to present a defense, to investigate, to rebut the government's evidence, effective assistance of counsel, to a fair and reliable sentencing determination and to compulsory process, and other rights under the Fifth, Sixth, Eighth and Fourteenth Amendments, as well as Rule 16 (d)(1) of the Federal Rules of Criminal Procedure.

Further reasons and argument for the motion are laid out in the memorandum accompanying the motion.

WHEREFORE, Mr. Paiz Guevara prays that the above and foregoing motion be, in all things, granted.

Respectfully submitted,

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W. Michael Chick, Jr. Esq.  
David P. Baugh, Esq.  
**ATTORNEYS FOR ACCUSED**

#### CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the above and foregoing MOTION FOR DESIGNATION OF TELEPHONE CALLS THAT THE GOVERNMENT INTENDS TO SEEK TO USE AT TRIAL was served, via ECF upon:

Stephen M. Campbell, Esq.

Julia K Martinez, Esq.  
Tobias Tobler, Esq.  
Assistant United States Attorneys  
Eastern District of Virginia  
2100 Jamison Avenue  
Alexandria, Virginia 22314,

And all other defendants in this matter by the Court's electronic filing  
system.

/s/ W. Michael Chick, Jr.  
**W. Michael Chick, Jr.**